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July 24, 2023

Via ECF Only

Honorable Leda Dunn Wettre. USMJ
Martin Luther King Building & U.S. Courthouse (MLK 3C)
50 Walnut Street
Newark, New jersey 07101

Re: *Parks, Nijeer v. McCormack, John, et al*
Civil Action 2:21-cv-04021

Dear Judge Wettre:

Plaintiff has filed a Notice of Voluntary Dismissal of his claims against the Middlesex County Prosecutor Defendants. (Copy of which is attached hereto). Therefore, the Stay that Your Honor had issued of this matter should be lifted. It is requested that Your Honor schedule a conference so that the remaining discovery can be completed and a trial date be fixed.

The Woodbridge Defendants have yet to provide reports rebutting plaintiff's experts who have not yet been deposed. Plaintiff also has several loose threads of discovery to complete.

Respectfully yours,


Daniel W. Sexton

DWS/swd

cc *Frederick L. Rubenstein via ECF only*
Phoenix Meyers, DAG via ECR only
Client via email only

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NIJEER PARKS
Plaintiff

CIVIL ACTION
No: 2:21-cv-04021 JXN- LDW

Vs


JOHN E. McCORMACK, MAYOR OF
WOODBIDGE, et alii

Defendants

NOTICE OF VOLUNTALRY
DISMISSAL PURSUANT TO
FRCP 41(a)(1)(A)(i)

Pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil procedure the plaintiffs and their counsel hereby give notice that the above referenced action is voluntarily dismissed, without prejudice against Defendants Middlesex County Prosecutor, Acting Prosecutor Christopher Kuberiet, in his individual and official capacity, and Assistant County Prosecutor, Peter Natasi, in his individual and official capacity.

Date: July 23, 2023


Daniel W. Sexton, Counsel for Plaintiffs
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